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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

CENTER FOR BIOLOGICAL DIVERSITY,
et al.,

Plaintiffs,

v.

BUREAU OF LAND MANAGEMENT, *et al.*,

Defendants,

Case No: CV 03-2509-SI

**STIPULATION AND
[PROPOSED] ORDER**

STIPULATION AND [PROPOSED] ORDER
Case No. CV 03-2509-SI

1 WHEREAS on March 14, 2006, the Court issued an Opinion and Order (“Order”)
2 resolving the parties’ cross-motions for summary judgment and directing the parties to file
3 simultaneous briefs on the appropriate form of relief within 14 days and response briefs within
4 21 days;

5 WHEREAS pursuant to the Court’s Order, the parties’ initial briefs are currently due on
6 March 28, 2006;

7 WHEREAS the parties have conferred and believe that the current due date for their
8 initial briefs should be extended by 30 days, to and including April 27, 2006, with a
9 corresponding extension of the due date for their response briefs to and including May 4, 2006,
10 because each party requires additional time to review the Court’s decision and develop a
11 proposal for appropriate relief;

12 WHEREAS the additional time will also allow the parties to explore the possibility of
13 reaching an agreement on the appropriate form of relief, which would obviate the need for
14 further briefing and conserve judicial resources;

15 WHEREAS this is the parties’ first request for an extension of time for this purpose; and

16 WHEREAS as demonstrated above, good cause exists for the proposed extension;

17 THEREFORE, PURSUANT TO LOCAL RULE 6-2, THE PARTIES HEREBY
18 STIPULATE THAT:

19 The parties shall file simultaneous briefs regarding the appropriate form of relief
20 on or before April 27, 2006, and the parties’ response briefs shall be filed on or
21 before May 4, 2006
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Respectfully submitted this 23rd day of March, 2006

/s/ Brendan R. Cummings (with permission
by Kevin W. McArdle)

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Pursuant to Stipulation, **IT IS SO ORDERED.**

DATED: _____



HONORABLE SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE